

## **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

PHI THETA KAPPA HONOR SOCIETY,	)
	)
Plaintiff/Counter-Defendant	) Civil Action No. 3:22-cv-00208-CWR-RPM
	)
v.	)
	)
HONORSOCIETY.ORG, INC.,	)
	)
Defendant/Counter-Plaintiff	)
/Third-Party-Plaintiff	)
	)
HONOR SOCIETY FOUNDATION, INC.,	)
	)
Defendant	)
	)
-----	)
	)
HONORSOCIETY.ORG, INC.,	)
	)
Defendant/Counter-Plaintiff	)
/Third-Party-Plaintiff	)
	)
v.	)
	)
DR. LYNN TINCER-LADNER,	)
	)
Third-Party Defendant	)

**Declaration of Dr. Lynn Tincher-Ladner**

I, Lynn Tincher-Ladner, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am the President and CEO of Phi Theta Kappa Honor Society (“PTK”).
2. Since the onset of Honorsociety.org, Inc.’s (“Honor Society”) malicious campaign against PTK in March 2024, PTK has already felt the effects.

3. I have already testified at length to PTK's ongoing damages, including through multiple Declarations submitted in support of PTK's Motions for Preliminary Injunction and in person before the Court during the July 12 Preliminary Injunction Hearing.

4. Due to Honor Society's conduct, PTK is experiencing unprecedented member attrition (i.e., members contacting PTK to request cancellation of their lifetime membership) and decline in membership acceptance.

5. In August 2024, PTK's membership acceptance rate was down over 41% on a year over year basis. *See* Ex. 1. This is particularly alarming I understand community college enrollment to be up, and PTK issued more invitations in its summer campaign than it did in 2023. I attribute this decline not only to Honor Society's malicious survey entitled "Community College Honor Societies Survey" ("CCHS Survey") that this Court has already partly enjoined but also Honor Society's online campaign to paint PTK (and myself) as villains.

6. I understand that Honor Society has produced a number of responses it has received in response to the enjoined questions from the CCHS Survey; however, because these responses are marked **HIGHLY CONFIDENTIAL – ATTORNEYS EYES ONLY**, I have been unable to personally review them.

7. PTK's counsel provided me a list of only student names and email addresses to compare with the present PTK membership/invitation list. My understanding is that at least two individuals on this list unsubscribed directly after responding to the CCHS Survey that, at the time, included the now enjoined questions.

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 6, 2024.



---

Lynn Tincher-Ladner, Ph.D.

## **EXHIBIT 1 to EXHIBIT B**

	To Date Aug 2023	To Date Aug 2024	*GoalTD Forecast	Month Goal Forecast	Goal Difference To Date	Month
<b>Division I</b>						
July	820	676	1,222	1,222	-546	-546
August	1,703	784	1,222	1,222	-438	-438
<b>Division I: Q3</b>	<b>2,523</b>	<b>1,460</b>	<b>2,082</b>	<b>4,428</b>	<b>-622</b>	<b>-2,968</b>
<b>Division I: YTD</b>	<b>21,591</b>	<b>19,634</b>	<b>23,588</b>	<b>32,752</b>	<b>-3,954</b>	<b>-3,954</b>
<b>Division II</b>						
July	1,116	975	1,166	1,166	-191	-191
August	2,086	1,185	1,166	1,166	19	19
<b>Division II: Q3</b>	<b>3,202</b>	<b>2,160</b>	<b>2,642</b>	<b>5,424</b>	<b>-482</b>	<b>-3,264</b>
<b>Division II: YTD</b>	<b>21,560</b>	<b>20,941</b>	<b>23,554</b>	<b>31,245</b>	<b>-2,613</b>	<b>-2,613</b>
<b>Division III</b>						
July	576	580	853	853	-273	-273
August	1,370	1,022	853	853	169	169
<b>Division III: Q3</b>	<b>1,946</b>	<b>1,602</b>	<b>1,606</b>	<b>3,562</b>	<b>-4</b>	<b>-1,960</b>
<b>Division III: YTD</b>	<b>15,458</b>	<b>15,174</b>	<b>16,888</b>	<b>22,860</b>	<b>-1,714</b>	<b>-1,714</b>
<b>Division IV</b>						
July	363	531	905	905	-374	-374
August	1,133	706	905	905	-199	-199
<b>Division IV: Q3</b>	<b>1,496</b>	<b>1,237</b>	<b>1,234</b>	<b>2,946</b>	<b>3</b>	<b>-1,709</b>
<b>Division IV: YTD</b>	<b>16,258</b>	<b>16,414</b>	<b>17,762</b>	<b>24,258</b>	<b>-1,348</b>	<b>-1,348</b>
<b>No Division</b>						
July	2	2	3	3	-1	-1
August	2	2	3	3	-1	-1
<b>No Division: Q3</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>5</b>	<b>1</b>	<b>-1</b>
<b>No Division: YTD</b>	<b>16</b>	<b>21</b>	<b>17</b>	<b>88</b>	<b>4</b>	<b>4</b>
<b>Total MTD</b>	<b>6,294</b>	<b>3,699</b>	<b>3,763</b>	<b>4,149</b>	<b>-64</b>	<b>-450</b>
<b>Total YTD</b>	<b>74,883</b>	<b>72,186</b>	<b>121,000</b>	<b>121,000</b>	<b>-48,814</b>	<b>-48,814</b>
<b>Percent Change</b>	<b>M:</b>	-41.2%		-1.7%	-10.8%	
	<b>Y:</b>	-3.6%		-40.3%	-40.3%	

\*Forecasted YTD and MTD totals are estimated using the forecasted monthly goal and the average percentage of joins MTD and YTD.

